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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re:

USA COMMERCIAL MORTGAGE  
COMPANY,

Debtor.

Case No. BK-S-06-10725-LBR

CHAPTER 11

**STIPULATION BETWEEN USACM  
LIQUIDATING TRUST AND  
DONNA CANGELOSI AND  
BRANDON ARNER CANGELOSI  
TO ALLOW IN PART PROOF OF  
CLAIM NO. 10725-01717-2 IN THE  
AMOUNT OF \$101,943.84; AND  
CERTIFICATE OF SERVICE**

The USACM Liquidating Trust (“USACM Trust”) and Donna Cangelosi and  
Brandon Arner Cangelosi (collectively, “Cangelosi”) stipulate as follows:

Cangelosi filed Proof of Claim No. 10725-01717-2 (the “Subject Proof of Claim”) in the amount of \$101,943.84 against USA Commercial Mortgage Company (“USACM”).

The Subject Proof of Claim is based upon a \$50,000 investment in the Placer Vineyards II Loan by Cangelosi.

On June 13, 2011, the USACM Trust filed a motion to allow the Placer II Claims. [DE 8436.] The Court heard that motion on July 26, 2011 and granted it by order dated August 24, 2011. [DE 8975.]

For the reasons set forth in the motion to allow [DE 8436] and the supporting declaration of Geoffrey L. Berman [DE 8437], the Placer II Claims should be allowed in full as general unsecured claims.



1 Accordingly, the Subject Proof of Claim should be allowed as a general unsecured  
2 claim in the amount of \$50,000 because that is the amount of the claim that is based upon  
3 an investment in the Placer II Loan; and

4 The remainder of the Subject Proof of Claim should be disallowed.

5 DATED this 7th day of October, 2011.

6 STIPULATED AND AGREED TO:

7 LEWIS AND ROCA LLP  
8

9 By /s/ John Hinderaker (#18024)  
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By: s/ Donna Cangelosi and on behalf of Brandon Arner Cangelosi  
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